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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 IN RE: SOCIAL MEDIA ADOLESCENT
11 ADDICTION/PERSONAL INJURY PRODUCTS
12 LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON
DISCOVERY FOR FEBRUARY 13, 2025
DISCOVERY MANAGEMENT
CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order (“DMO”) No. 2 (ECF 606), the Personal Injury (“PI”) and School District and Local Government Entity (“SD”) Plaintiffs, State Attorneys General (“State AGs”), and Defendants submit this agenda and joint statement in advance of the February 13, 2025, Discovery Management Conference (“DMC”).

I. Undisputed Administrative Issues the Parties Would Like to Bring to the Court’s Attention Which Do Not Require Court Action

A. Meta v. State AGs

Some states’ agencies have met the substantial completion deadlines most recently ordered by Magistrate Judge Kang on December 31, 2024 (ECF 1495), and others have not, including some who have requested extensions of their deadlines. Meta and the State AGs are meeting and conferring about whether they can reach agreement on a global extension of all states’ agencies’ substantial completion deadlines, accompanied by an extension of Meta’s deadline, in turn, to complete depositions. The Parties expect to present any agreement on these extensions they are able to reach via a stipulation and proposed order to be submitted before the DMC.

II. Administrative Issues that Are Disputed or Require Court Action

The Parties do not have any disputed administrative issues that they would like to bring to the Court’s attention.

III. Ripe Disputes for Which Joint Letter-Briefs (“JLBs”) Have Already Been Filed or Will Be Filed Imminently

A. Meta v. Plaintiffs

1. Whether and how to count time used by non-MDL/JCCP plaintiffs (namely, AGs from non-MDL states) at depositions with respect to MDL deposition time limits, and whether those limits should be expanded if additional witnesses are added to Meta’s initial disclosures who have not previously been identified for deposition

B. Meta v. State AGs

2. Meta’s 30(b)(6) Deposition Notices to States: Topics (JLB to be filed on February 10, 2025)

1 **IV. Unripe Disputes**

2 **A. Defendants v. PI Bellwether Plaintiffs**

- 3 1. Plaintiff Jessica Smith's clawback of communications based upon the
4 patient/therapist privilege and Defendants' request for certain medical records
5 from Plaintiff Jessica Smith
6
7 2. Defendants' production of bellwether-specific data
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9 3. RFPs held in abeyance
10 4. Deposition notices

11 **B. Defendants v. SD Bellwether Plaintiffs**

- 12 1. Addition of Hillsborough custodians
13 2. Depositions of summary judgment and/or trial witnesses
14 3. Defendants' request to expand SD BW Plaintiff deposition cap for DeKalb
15 4. SD BW Plaintiff preservation/collection and litigation hold issues
16 5. Collection and production of Jordan SD custodian Bryce Dunford's emails from
17 personal account
18 6. District-specific RFPs
19 7. Jordan SD-specific search terms
20 8. Dismissal of non-BW SD cases for failure to submit PFS and SUP-PFS by
21 Court's Implementation Order deadlines
22 9. Bellwether School District RFP Set A

23 **C. Meta and Snap Defendants v. Plaintiffs**

- 24 1. Stipulated Source Code Protective Order

25 **D. Meta v. Plaintiffs**

- 26 1. Interrogatories relating to Plaintiff-specific affirmative defenses
27 2. Meta's responses to Interrogatory No. 1 and Plaintiffs' Second, Third, Fourth, and
28 Fifth Set of Interrogatories
29 3. Meta's responses to Plaintiff's First Set of Requests for Admission

- 1 4. Meta's written interrogatory responses from Meta Related Actions
- 2 5. Plaintiffs' ability to share Highly Confidential documents with Apex witnesses

3 **E. Meta v. State AGs**

- 4 1. Possible extensions of State/agency substantial completion and deposition
5 deadlines
- 6 2. Hours allowance for Meta's depositions of State witnesses (if anticipated
7 resolution not reached)
- 8 3. State AGs' responses to Meta's First Set of Interrogatories Nos. 1-2, 5-7
- 9 4. State AGs' responses to Meta's Second Set of Interrogatories
- 10 5. State AGs' responses to Meta's Third Set of RFPs
- 11 6. Meta's responses to State AGs' RFP Nos. 102, 162-163
- 12 7. Meta's responses to State AGs' RFPs related to structured financial data
- 13 8. State AGs' 30(b)(6) Deposition Notice of Meta

14 **F. Meta v. PI/SD Plaintiffs**

- 15 1. School District RFP No. 3 from Set A
- 16 2. Privilege disputes

17 **G. Snap v. PI/SD Plaintiffs**

- 18 1. Snap's production of certain non-custodial sources
- 19 2. Snap's assertion of privilege over certain hyperlink requests and redacted material

20 **H. TikTok v. PI/SD Plaintiffs**

- 21 1. Personnel materials for certain deponents
- 22 2. School District RFP No. 5
- 23 3. Plaintiffs' challenges to the TikTok Defendants' privilege claims
- 24 4. Interrogatories Sets 4 & 5
- 25 5. User Feedback Data Spreadsheets

- 1 6. Errors in TikTok's production of chat files¹
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3 **I. YouTube v. PI/SD Plaintiffs**
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- 5 1. RFP Nos. 16 and 18, per Stipulated Order (Dkt. 1294) – negotiating search terms
6 2. RFP Nos. 86-87 – awaiting proposal from YouTube re search and production of
7 sampling of advertisements responsive to these RFPs
8 3. Production and meet-and-confer re non-custodial sources
9 4. Privilege log challenges
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¹ Plaintiffs reserve the right to make this issue ripe and the Parties may ask to update the Court regarding the status of TikTok's document productions at the DMC.

1 Respectfully submitted,

2 DATED: February 7, 2025

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ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: February 7, 2025

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